

Public and unofficial staff access  
to this instrument are  
prohibited by court order

United States Courts  
Southern District of Texas  
FILED

January 13, 2021

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

Nathan Ochsner, Clerk of Court

UNITED STATES OF AMERICA

VS.

AUSTIN JORDAN YOUNG

§  
§  
§  
§  
§  
§

CRIMINAL NO. H-21-

**4:21-cr-22**

**INDICTMENT**

The United States Grand Jury charges:

At all times material herein:

1. The Federal Deposit Insurance Corporation (FDIC) was an agency of the federal government which insured the deposits of member banks against loss up to \$100,000 with the purpose of preventing their collapse and instilling public confidence in the nation's banking institutions.
2. Chase Bank, including its branches, was a financial institution the deposits of which were insured by the FDIC.
3. Wells Fargo Bank, including its branches, was a financial institution the deposits of which were insured by the FDIC.
4. Bank of America, including its branches, was a financial institution the deposits of which were insured by the FDIC.
5. BBVA Bank, including its branches, was a financial institution the deposits of which were insured by the FDIC.
6. First Tennessee Bank, including its branches, was a financial institution the deposits of which were insured by the FDIC.
7. Texas Capital Bank, including its branches, was a financial institution the deposits

of which were insured by the FDIC.

**COUNT 1**  
**(Conspiracy - 18 U.S.C. § 1349)**

**A. INTRODUCTION**

1. The Grand Jury adopts, realleges, and incorporates the allegations in paragraphs 1-7 of the Introduction of this Indictment as if set out fully herein.

**B. THE CONSPIRACY AND ITS OBJECTS**

2. From on or about January 1, 2020 and continuing until on or about September 28, 2020, in the Houston Division of the Southern District of Texas and elsewhere,

**AUSTIN JORDAN YOUNG,**

Defendants herein, did knowingly and willfully combine, conspire, confederate, and agree with others known and unknown to the Grand Jury to execute and attempt to execute a scheme and artifice to defraud Chase Bank, Wells Fargo Bank, Bank of America, BBVA Bank, First Tennessee Bank, and Texas Capital Bank, financial institutions the accounts of which were insured by the FDIC, and to obtain money, funds, and property under the custody and control of the above-listed financial institutions, by means of false and fraudulent pretenses, representations, and promises in violation of Title 18, United States Code, Section 1344 (Bank Fraud);

**C. THE MANNER AND MEANS OF THE CONSPIRACY**

The manner and means of the conspiracy were as follows:

3. The conspirators stole mail from private mailboxes and U.S. Postal Service collection boxes.

4. The conspirators recruited cooperating account holders (CAH) from social media with promises of making “legal money” by allowing the use of their bank accounts.

5. The conspirators posted videos on social media of large amounts of cash and the

types of bank cards wanted to entice people to allow them to use their accounts.

6. The conspirators would obtain the CAHs' bank cards and account log-in information to monitor their accounts.

7. The conspirators would deposit checks stolen from the mail into the CAHs accounts.

8. The conspirators would use the bank cards of the CAHs to withdraw the proceeds of the counterfeit checks. The CAHs never received any funds and were often responsible for chargeback fees to their accounts when the counterfeit checks were refused by the issuing banks.

**D. OVERT ACTS**

9. In furtherance of the conspiracy, and to effect the objects thereof, the conspirators performed and caused to be performed, among others, the overt acts set forth in Counts Two through Seven of this indictment, hereby re-alleged and incorporated as if fully set forth in this Count of the indictment.

In violation of Title 18, United States Code, Section 1349.

**COUNTS 2- 7**  
**(Bank Fraud - 18 U.S.C. § 1344)**

**A. INTRODUCTION**

The Grand Jury adopts, realleges, and incorporates herein the allegations in paragraphs 1-7 of the Introduction of this Indictment as if set out fully herein.

**B. THE SCHEME AND ARTIFICE TO DEFRAUD**

2. From on or about January 1, 2020 and continuing until on or about September 28, 2020, in the Houston Division of the Southern District of Texas and elsewhere,

**AUSTIN JORDAN YOUNG,**

Defendants herein, did knowingly execute and attempt to execute a scheme and artifice to defraud Chase Bank, Wells Fargo Bank, Bank of America, BBVA Bank, First Tennessee Bank, and Texas Capital Bank, financial institutions the deposits of which were insured by the FDIC, and to obtain moneys and funds owned by and under the custody and control of the above-listed financial institutions, by means of false and fraudulent pretenses, representations, and promises as further set forth in the counts below.

**C. THE MANNER AND MEANS OF THE SCHEME AND ARTIFICE TO DEFRAUD**

3. Among the manner and means by which the Defendants sought to accomplish and did accomplish the purpose of the scheme to defraud are the acts set forth in paragraphs 3 through 8 of Count One of this Indictment, hereby re-alleged and incorporated as if fully set forth in these counts.

**D. EXECUTION OF THE SCHEME AND ARTIFICE**

4. On or about the following dates, in the Houston Division of the Southern District of Texas, the Defendants executed and attempted to execute the scheme and artifice set forth above by knowingly and fraudulently conducting the following transactions, by depositing a counterfeit check as described in the Counts below:

COUNT	DATE	AMOUNT OF CHECK	DESCRIPTION OF CHECK	BANK OF DEPOSIT
TWO	March 31, 2020	\$19,569.14	Drawn on Wells Fargo account of Flying Food Group	Bank of America
THREE	August 17, 2020	\$16,874	Drawn on First Bank of Tennessee account of T&T Industries	Bank of America
FOUR	August 17, 2020	\$15,336.16	Drawn on Texas Capital Bank account of Hartman Income REIT	Bank of America
FIVE	August 24, 2020	\$9,424.78	Drawn on BBVA Bank account of Jubilee Gifts and Wearables	Bank of America
SIX	August 25, 2020	\$509.13	Drawn on BBVA Bank account of Jubilee Gifts and Wearables	Wells Fargo Bank
SEVEN	August 31, 2020	\$5,000	Drawn on the Wells Fargo Bank account of S.C.	Wells Fargo Bank

In violation of Title 18, United States Code, Sections 1344 and 2.

**COUNT 8**  
(Possession of Stolen Mail – 18 U.S.C. § 1708)

From on or about January 1, 2020 until on or about September 28, 2020, in the Houston Division of the Southern District of Texas,

**AUSTIN JORDAN YOUNG,**

Defendants herein, did possess checks, letters, credit cards, debit cards, gift cards, bank statements and other mail items, which had been stolen from the United States Mail, knowing that said items had been stolen.

In violation of Title 18, United States Code, Sections 1708 and 2.

**NOTICE OF FORFEITURE**  
**(18 U.S.C. § 982(a)(6))**

Pursuant to Title 18, United States Code, Section 982(a)(6), the United States gives notice to the defendants,

**AUSTIN JORDAN YOUNG,**

that in the event of conviction of the offenses charged in Counts One through Eight of this Indictment, the United States intends to seek forfeiture of all conveyances used in and of all property used to facilitate, or intended to be used to facilitate, the commission of the offenses.

**Money Judgment and Substitute Assets**

The United States gives notice that it will seek a money judgment against the defendant. In the event that one or more conditions listed in Title 21, United States Code, Section 853(p) exist, the United States will seek to forfeit any other property of the defendants up to the value of the

property subject to forfeiture.

TRUE BILL

Original Signature on file

---

FOREPERSON OF THE GRAND JURY

RYAN K. PATRICK  
United States Attorney

  
\_\_\_\_\_  
JAY HILEMAN  
Assistant United States Attorney